

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
-vs-	)	<b>No. CR-20-240-F</b>
	)	
<b>BOBBY CHRIS MAYES,</b>	)	
	)	
<b>Defendant.</b>	)	

**UNITED STATES' MOTION TO REVOKE CONDITIONS OF RELEASE  
AND ISSUE WARRANT FOR ARREST**

COMES NOW the plaintiff, United States of America, by Robert J. Troester, United States Attorney for the Western District of Oklahoma, through Thomas Snyder, Assistant United States Attorney, and respectfully requests, pursuant to Title 18, United States Code, Section 3148, that the Court revoke the conditions of release set in this matter and issue a warrant for the immediate arrest of Defendant Bobby Chris Mayes. In support of said motion, the United States would state as follows:

1. On September 16, 2020, a federal grand jury indicted Bobby Chris Mayes, Charles Gooch, and Courtney Wells on twenty-five counts, including Conspiracy to Commit Wire Fraud (Count 1) in violation of 18 U.S.C. § 1349; Wire Fraud (Counts 2–13) in violation of 18 U.S.C. § 1343; Uttering Forged

Securities (Counts 14–19) in violation of 18 U.S.C. § 513(a) and Aggravated Identity Theft (Counts 20-25) in violation of 18 U.S.C. § 1028A(a)(1). (Doc. 1.)

2. On September 22, 2020, United States Magistrate Judge Gary Purcell ordered that Defendant Bobby Chris Mayes be released on conditions. (Doc. 28–30.) Those conditions include that the defendant must not violate any federal, state, or local law while on release and that he not possess a firearm. (Doc. 29.)

3. On November 3, 2021, all three defendants proceeded to trial. On November 19, 2021, the jury returned its verdicts – guilty as to Mr. Mayes and Mr. Gooch on all counts, and guilty as to Ms. Wells on Counts 1, 3, 4, 7–10 and 14–25. The jury returned not guilty verdicts as to Ms. Wells on Counts 2, 5, 6, 11, 12, and 13.

4. Afterwards, the Defendants filed a series of motions challenging the verdict, including motions for acquittal and a motion for new trial based on alleged government misconduct. Those motions were set for hearing on May 10, 2022. (Doc. 211.)

5. On May 9, 2022, counsel for Mr. Mayes filed a motion to continue a scheduled hearing based on new developments and newly discovered evidence that counsel believed would give rise to additional grounds for a new trial. (Doc. 221.) Defendant Mayes’ motion raised a number of issues, but was primarily based on two groups of e-mails, one group that was allegedly

authored prior to the trial in this matter, some dating back to 2013, and another two e-mails there were allegedly authored by Wells and e-mailed on May 3, 2022.

6. On October 24, 2022, Wells and her boyfriend, Brandon Landers, were found in Mexico and taken into custody by Mexican law enforcement.

7. On October 25, 2022, Wells and Landers arrived in Houston, Texas, and were taken into custody by the FBI. Both individually confirmed that Mr. Mayes was involved in the planning of their flight and indeed the plan was for all three of them to leave and go to Mexico in May. In fact, Mr. Mayes researched and found the border crossing in McAllen, Texas that Wells and Landers used. According to Landers, they spoke with Mr. Mayes every day leading up to their leaving and Mr. Mayes arranged for the purchase of Landers' truck so they would have additional money when they left and told them he would give them around \$40,000.00. In addition, Mr. Mayes purchased a gun from Landers before they left.

8. Both Wells and Landers confirmed they left on May 2, 2022, which is corroborated by their phone records. They travelled to Texas that day and crossed the border on May 3, 2022. The plan was for Mr. Mayes to follow them. Mr. Mayes contacted them on the afternoon of May 3 to confirm they had made it to Mexico. Following that, they maintained contact with Mayes via email. As recently as last week, he led them to believe he may have also been in

Mexico at that time. Mr. Mayes at times helped arrange to get them money to assist in their flight.

9. Wells and Landers have both indicated the e-mails serving as the basis of Mr. Mayes's motion are fake. At least with regards to the May 3, 2022, emails allegedly from Wells, this is corroborated by the phone and Google records, which show that Wells and Landers left on May 2 and that the emails were sent from Native Harvest Dispensary or Oklahoma Motor Cars, where Mr. Mayes works, on May 3, 2022.

10. As such, Mr. Mayes has violated his conditions of his pre-sentence release by possessing a firearm. Furthermore, he has violated his conditions by committing another federal crime—to include 18 U.S.C. § 922(n) (receiving a firearm while under indictment), and 18 U.S.C. 1512 (tampering with or attempting to interfere in an official proceeding).

11. For the above stated reasons, pursuant to 18 U.S.C. § 3148(b), the United States respectfully requests that a warrant be issued for Defendant Bobby Chris Mayes arrest, that he be brought before this Court immediately thereafter for a bond violation hearing regarding revocation of said Order of Release, and that his bond be revoked.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

For Defendant, Bobby Chris Mayes:  
W. Brett Behenna  
Michelle L. Greene  
William H. Bock  
Vicki Zemp Behenna  
Rachel Jordan

s/ THOMAS B. SNYDER  
Assistant United States Attorney